

**DEFENDANTS' MOTION TO STAY PROCEEDINGS PENDING  
RESOLUTION OF RELATED CLASS ACTION**

For the reasons stated in the attached memorandum, Defendants Thomas J. Vilsack, in his official capacity as Secretary of Agriculture, and Zach Ducheneaux, in his official capacity as Administrator of the Farm Service Agency (collectively, USDA or Defendants), move to stay this case until final resolution related litigation that has been certified as a class action under Federal Rule of Civil Procedure 23(b)(2). Counsel for Defendants have conferred with counsel for Plaintiff, and Plaintiff opposes this request.

Dated: July 19, 2021

Respectfully submitted,

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